

Dear Sir or Madam:

I am an American Sign Language (ASL) interpreter with NIC Master Certification. I was born into the "Deaf world" as my parents are both Deaf. As a "C.O.D.A" (Child of Deaf Adults) I was able to sign before I could speak English. I am familiar with the Deaf culture, ASL, and feel at home within the Deaf community.

I grew up being my parent's ears for them and as a result was relied upon to interpret for them throughout my childhood. As an adult I frequently volunteered my interpreting services to friends and family. Approximately six years ago I pursued interpreting as a profession and absolutely love what I do. Basically I have been involved with ASL and interpreting for the past 40 years therefore have a unique perspective and extensive experience to my credit.

In addition, during the last few years I have worked as a CA for a large and well known Video Relay Service (VRS) provider in two of their call centers. I currently work with a "white label" in my "at home call center". Having worked at both a "traditional/corporate call center" and a "home based call center" I am able to compare and contrast the two scenarios based on what I have experienced firsthand.

As a C.O.D.A., a professional interpreter, and experienced CA, I have been disturbed about the misleading comments made about "white labels" and "at home call centers". I appreciate the opportunity to address my concerns here to the FCC. I will attempt to be concise albeit thorough in my comments.

First and foremost the "white label" I work with follows the same FCC rules as a "corporate giant" (like Sorenson or Go America/Purple). In the case of "white labels" I believe we are better equipped to adhere to Title IV of the ADA section 225 and FCC rules.

I am confident in making the statement "BETTER" for these reasons:

(1) All the interpreters in our home based centers are NATIONALLY certified and have YEARS of experience not just as interpreters but as CAs. EVERYONE!

This is not the case with the corporate giants that run traditional call centers. I know for a fact that not all interpreters at traditional centers are nationally certified, state certified, or even state licensed or screened. There are far too many interpreters at the nationally well-known company that have limited knowledge of ASL, the Deaf community, professional interpreting, or standard practices in VRS. Even in states where a state license or screening is required the traditional VRS company is hiring interpreters without this basic credential to work in the state as a freelance interpreter. These people are being put on the phones and interpreting VRS calls just after a couple of days of training. This results in CAs who are inexperienced, unprofessional, and inadequately skilled.

(2) Since all the interpreters at our "white label" company are nationally certified (either RID or NAD) we follow a strict Code of Ethics (a/k/a Code of Professional Conduct). For more information on the tenets included in the current Code of Professional Conduct (CPC) please go to <http://www.rid.org/ethics/code/index.cfm>

The CPC guides us in making ethical and professional decisions that respect the consumers we work with. Obtaining national certification is a big achievement and one each interpreter cherishes. A certified interpreter has a sense of pride for all s/he has accomplished and does not behave in a manner to jeopardize this certification and his/her reputation within the community. With a nationally certified interpreter (as we have in our "white label" company) there is the highest standard of professionalism and strict adherence to our code of ethics. My "white label" has a ZERO TOLERANCE policy for fraud.

Interpreters who are not nationally certified (like some of those at traditional call centers) have nothing to lose. Some are unaware that they behave unethically or unprofessionally because they have not been properly trained. This lack of knowledge leads to fraud and poor customer service.

(3) Each interpreter at the "white label" has made a financial investment in the company. Due to this vested interest we all work together for the success of our company. This success is not defined by how much money we can line our pockets with. On the contrary, our success at the "white label" is defined by satisfaction within the Deaf community because we listen to what they want/need and provide it. We are not just CA's processing calls; we are an extension of the Deaf community. We treat consumers with respect and are treated with respect in return. This creates a mutually comfortable and understood "partnership" between the CA and caller. This creates a successful interpretation and paramount customer service.

In a traditional call center there is no vested interest in the Deaf community. A CA comes to the call center, punches in, and processes as many calls as possible as quickly as possible, so that the corporation can make as much money as possible. The CA is there to make a huge profit for the corporation, not answer to the Deaf community.

(4) With traditional call centers there are rigorous demands placed on CA's. Over the years these demands have been increasingly stressful. CA's must meet certain standards so that the corporation can make as much of a profit as possible. Not meeting these standards is detrimental to the CA in terms of pay, scheduling of hours, and their status within the corporation.

The problem begins with the fact that the corporation earns a certain amount of money per minute a CA is interpreting. The less qualified and experienced a CA is, the less the corporation must pay a CA per hour. As a result, in order to achieve a bigger profit the corporation hires unqualified and inexperienced CA's. This practice is what leads to fraud because the CA is not familiar with the Code of Ethics/Code of Professional Conduct or standard practices in the interpreting and VRS fields. Another practice perpetrated by corporations that lead to fraud is high demand and stress. There are increasing demands placed on CA's by the traditional call centers that causes CA's to "burn out" quicker. This "burn out" makes some CA's more vulnerable to perpetrate fraud. The CA does not want to lose their job so they invent creative ways to "keep up their stats". Unfortunately desperation

and exhaustion leads CA's to compromise themselves mentally and physically as well as behave unethically and criminally. I do not believe it is a coincidence as the demand and stress level at traditional call centers has increased over the past few years, so has the fraud and poor customer service.

We do not have this problem in a "white label". Each CA is paid for each minute worked. The CA works at their own pace and can take a break whenever needed without penalty. This lack of pressure to post minutes allows us to provide better customer service. We are focused on the Deaf consumer and go at THEIR pace instead of stressing about logging on minutes and making as much money as possible for the corporation. This results in CA's at the "white label" being perceived as humans, not machines.

(5) It is imperative that a call center have the highest security to insure confidentiality and customer privacy. There is less security, privacy, and confidentiality in a traditional call center than in a home based center.

I have a room designated in my home as a "home based call center". This room has a locked door and I only have access to the center and all the equipment. There is nobody around to overhear or eavesdrop while I am working. I cannot hear others interpreting their calls as I am trying to interpret mine. There is no delivery person or cleaning crew coming through my home based call center while I am working. A home based call center has the utmost security because a CA is alone in a designated room only focused on his/her callers. There is no audience so there is no breach of confidentiality and there is the utmost respect for callers and their privacy.

In a traditional call center there are cubicles (sometimes called "stations") with many interpreters very close to each other. This results in all CA's hearing each other while working. A CA becomes privy to other calls which she is not involved in interpreting. Such exposure to other CA's calls also results in gossiping and discussing content between calls or during breaks.

In traditional call centers non-employees have access to the center and the ability to hear calls being interpreted. When deliveries are made, maintenance comes in to fix a problem, or the cleaning crew comes through the CA's are continuously working. This compromises VRS consumers' privacy and confidentiality. Not only can the CA be heard but sometimes the Deaf consumer can be seen on the monitor.

I also witnessed spouses and children coming in to a traditional call center during "working hours" to visit. Some CA's have brought their children to work and left them in the kitchen or conference room while interpreting calls. These visits and extended stays by family members are a flagrant breach of confidentiality and standard VRS practice. It leaves callers vulnerable and shows lack of respect for the Deaf community.

(6) As in a traditional call center, my home based call center has a battery back-up. I am able to process ALL calls that come in. I am able to process emergency calls. In the event I need to transfer this can be done as quickly and efficiently as in a traditional call center. I also have support available to me 24/7/365. I feel like my management team is committed and supportive.

(7) In order to get to a traditional call center many CA's have to travel a long distance. Difficult

weather often prohibits or delays CA?s from being able to keep their shift at the traditional call center.

With a home based call center there is no issue of commuting, consuming fuel, and putting wear and tear on your car and your body. Home based CA?s are focused on the task at hand, well rested, and enthusiastic to greet each caller.

Thank you for taking my comments into consideration.

Sincerely,

Elizabeth A. Nadolski

ASL Interpreter

NIC Master, BA